



Mary Nichols, Chair  
CARB  
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## Kern Audubon Society

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Bakersfield CA 93385

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ORIGINAL: Board Clerk  
Copies: Executive Officer  
Chair

Dear Ms. Nichols,

I am the conservation chairman for Kern Audubon, a chapter of 600 members centered in Bakersfield. I am unable to attend any of the public meetings regarding AB32 implementation by CARB. However, I would like the following comments to be placed in the official record for the hearings.

Kern Audubon congratulates the California Air Resources Board on its draft recommendations for implementation of the legislation that mandates a global warming reduction policy be implemented by state agencies. However, Kern Audubon believes that the proposed initiatives need to be going farther to prevent catastrophic climate change.

Your final scoping plan needs to address the following issues:

- 1) The plan should include stronger measures that require local entities to reform land use planning policies that reduce vehicle commuter miles traveled
- 2) The Renewable Portfolio Standard (RPS) for electricity providers should be retained at 33%. The fee-in tariffs and community choices aggregation are just two ways that will allow the electricity providers to meet this level by 2020.
- 3) The plan should include provisions and specific requirements for automakers to sell zero-emission vehicles. A timetable needs to be developed. With the current rapid increase in gasoline prices, the market place will be a formidable ally in implementing this provision.
- 4) Polluters should have to pay for the cleaning up of damage they cause to the environment. A carbon market, if established, would be a vehicle for the auctioning of emission allowances.
- 5) Any revenues, fees, fines, and auction profits should go toward the development and enhancement of clean energy technologies, public transportation, green jobs, and aiding low-income consumers.
- 6) Any allowable offsets should be limited in number and subject to rigorous criteria.
- 7) Policies should be supported that minimize the air quality impacts in our most polluted communities. For example, Arvin, a town with the chapter's boundaries, is one of the most polluted San Joaquin Valley communities, with a high incident of poor air quality related diseases.

Thank you for the opportunity to relay the concerns of the members of Kern Audubon.

Sincerely,

*Harry Love*  
Harry Love, Conservation Chairman

